

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No. 17-10946
	:	
Ralph D. Palm, Jr.	:	
Debtor	:	CHAPTER 13
	:	
Santander Bank, N.A.	:	
	:	
Movant	:	
Vs.	:	
	:	
Ralph D. Palm, Jr.	:	
Respondent	:	

ANSWER TO MOTION OF SANTANDER BANK, N.A.
FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes Ralph D. Palm, Jr., Debtor herein by his attorney Paul H. Herbein, Esquire and prays this Honorable Court deny the Movant's motion and allow the automatic stay to remain under affect.

1. Admitted.
2. Admitted.
3. Denied. This averment is a conclusion of law to which no answer is required.
4. Denied. This averment is a conclusion of law to which no answer is required.
5. Denied. It is denied that Movant wishes to institute foreclosure proceedings on the mortgage because of Debtor's failure to make the monthly payment required hereunder.

To the contrary, Debtor is without sufficient knowledge as to the truth or falsity of this averment and the same is therefore denied and strict proof is demanded at time of hearing if relevant.

6. Admitted.

7. Admitted.

8. Denied. This averment is a conclusion of law to which no answer is required.

WHEREFORE, Debtor requests this Honorable Court to dismiss Plaintiff's motion for relief.

Respectfully submitted,

/s/ Paul H. Herbein, Esquire
PAUL H. HERBEIN, ESQUIRE
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Dated: June 20, 2017